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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LISA J. CISNEROS
REGARDING LATE FILING ON
MARCH 2, 2013**

1 I, Lisa J. Cisneros, declare as follows:

2 1. I am an associate with Lief, Cabraser, Heimann & Bernstein, LLP (“Lief
3 Cabraser”), Interim Lead Counsel for Plaintiffs and the proposed Class. I make these statements
4 based on personal knowledge and would so testify if called as a witness.

5 2. I am a member in good standing of the bar of the State of California, as well as the
6 U.S. District Courts for the Northern District of California.

7 3. Pursuant to this Court’s Local Rule 5(e)(4), I hereby submit the following
8 declaration to address the late filing of the parties’ Joint Discovery Status Report (Status Report),
9 Docket No. 336, and the accompanying Administrative Motion to Seal, Pursuant to Civil Local
10 Rule 79-5(d), Exhibit A to the March 1, 2013 Joint Discovery Status Report, Docket No. 335.

11 4. Party approvals as to the final content of the Status Report were received at or near
12 midnight, but then the filing was unexpectedly delayed due to a malfunction on my firm’s
13 network which our firm’s Director of Information Technology believes was caused by a
14 significant system backup project at that time. We have taken steps to avoid such a problem
15 happening again in the future.

16 I declare under penalty of perjury under the laws of the State of California that the above
17 is true and correct. Executed on March 2, 2013 at San Francisco, California.

18 /s/ Lisa J. Cisneros
19 LISA J. CISNEROS

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